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Policy Branch
International Bureau

March 11, 2003

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MAR 11 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Received
MAR 20 2003
Policy Branch
International Bureau

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Celsat America, Inc.
File Nos. 26/27/28-DSS-P-94, 36-SAT-AMEND-95,
65/66/67-SAT-AMEND-96, 192-SAT-AMEND-97,
and 88-SAT-AMEND-98
Orbital Debris Mitigation Statement Update

Dear Ms. Dortch:

Yesterday, the enclosed transmittal letter submitting the Orbital Debris Mitigation Statement Update ("Statement") prepared by Celsat America, Inc. was filed at the Commission without the requisite attachment. Please accept this resubmission of the transmittal letter, together with the Statement, to correct this oversight.

If you have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,



Brian D. Weimer
Counsel to Celsat

Enclosure

FILE COPY

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Orbital Debris Mitigation Statement Update

Dear Ms. Dortch:

Enclosed herewith please find a copy of the Orbital Debris Mitigation Statement Update ("Statement") prepared by Celsat America, Inc. ("Celsat"). Celsat has prepared the Statement to provide the Commission with additional details concerning its orbital debris mitigation plans, as required by Celsat's authorization (see *In Re Celsat America, Inc. Concerning Use of the 1900-2025/2165-2200 MHz and Associated Frequency Bands for a Mobile-Satellite System*, Order and Authorization, released July 17, 2001, at paras. 20-21).

As more fully described in the Statement, Celsat and its satellite contractor (Space Systems Loral) have devised a plan to limit the probability of collision with large, known objects during the orbital lifetime of Celsat's satellites. In addition, the Statement provides greater specificity regarding the post-mission disposal parameters for Celsat's satellites. In particular, the Statement describes Celsat's plan to raise its decommissioned spacecraft 300 kilometers above operational altitude in order to vent and empty all propellants and pressurants and to power off all payload elements.

Marlene Dortch
March 10, 2003
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If you have any questions regarding this submission, please contact
the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. D. Weimer', with a long horizontal flourish extending to the right.

Brian D. Weimer
Counsel to Celsat

Enclosure

Orbital Debris Mitigation Statement Update

Reference 1: Amendment to Application of Celsat America Inc. dated November 2, 2000

Reference 2: Celsat America Inc., Order and Authorization, DA 01-1632 dated July 17, 2001 (Section G Paragraphs 20 and 21)

In response to FCC requirements, Celsat provided narrative describing Celsat's plan for orbital debris mitigation as a part of Reference 1. In compliance with Section G of Celsat's license (Reference 2) additional detail is provided below. This detail was developed with the help of Celsat's satellite contractor Space Systems Loral.

FCC statement (Reference 2, Paragraph 20): *“Celsat did not address limiting the probability of collision with large, known objects during satellite orbital lifetime.”*

Celsat's response: Chance of collisions with the background environment including micrometeoroids is considered as part of the satellite design. These effects of micrometeoroids and meteoroids are considered on a statistical basis to determine collision risk. Celsat's satellite contractor (Space Systems Loral) includes meteoroid environments as part of all satellite Environmental Requirement Specifications. Literature is reviewed for large size space objects, particularly technical papers that present collision probability estimates for orbital conditions of interest. These papers include data obtained from the USSPACECOM Catalog, Haystack radar, etc. If deemed necessary additional assessment will be requested from an outside consultant to review the design and flight profile.

FCC requirement (Reference 2, Paragraph 21): *“in order to permit assessment of Celsat's disposal plan and provide adequate information for potentially effected parties, we require Celsat to supplement its narrative statement by providing greater specificity regarding the storage orbit parameters selected for post-mission satellite disposal.”*

Celsat's response: Post-mission disposal of satellite from operational orbit will be accomplished by carrying out end-of-life maneuvers. The fuel budget for this operation will be included in the satellite design. The decommissioned spacecraft will be raised 300 kilometers above the operational altitude. At that point, all the propellant tanks will be very close to empty. All remaining propellants and pressurants will be vented and all payload elements will be powered off.